

# **Exhibit 28**

WILMERHALE

**Via Overnight Mail**

February 25, 2019

Amy A. Null

+1 617 526 6541 (t)  
+1 617 526 5000 (f)  
amy.null@wilmerhale.com

Sharon Petshaft  
Employee Plans Specialist  
Department of the Treasury  
Internal Revenue Service  
TE/GE Employee Plans  
150 Court Street; 5<sup>th</sup> Floor  
New Haven, CT 06510

Re: Plan Name: RJM Capital, LLC Pension Plan  
Plan Number: 001  
Plan year ended: December 31, 2016

Dear Ms. Petshaft:

On behalf of RJM Capital, LLC Pension Plan, I enclose the following in response to your request of February 4, 2019, a copy of which is attached.

Our responses to your request are provided below.

**1. RJM Capital LLC Pension Plan (the "RJM Plan")**

a) Please submit all monthly bank and broker statements for 2012, 2013, 2014, 2015 and 2016.

**RESPONSE:** Please see the documents in folder 1.a in the accompanying electronic media which include, for the RJM Plan, monthly statements from First Republic Bank for the months 2/13-12/16, JP Morgan bank account statements for the months 11/13-12/16, JP Morgan LDR account statements for the months 10/14-12/16, statements for the Plan account at Solo Capital Partners LLP (a firm that was authorized and regulated by the Financial Conduct Authority of the U.K.) which show details of the trading activity for 2013 and 2014, as well as an interim cash flow statement, [Redacted - Relevance] As the RJM Plan was adopted in 2013 (see prior response to Request #A1 submitted 5/8/18), there are no statements for 2012.

b) RJM Capital- from your pdf doc "RJM Capital Annual Plan Values 2013 - 2016"

i. The 12/31/2012 asset balance \$0, but investment earnings were \$6,806,136 in 2013. Submit all monthly 2013 bank and broker statements that show the

Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts 02109

Beijing Berlin Boston Brussels Denver Frankfurt London Los Angeles New York Palo Alto Washington

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*source(s) that comprise the \$6,806,136 investment earnings in 2013 and provide a detailed explanation of each source.*

**RESPONSE:** In addition to the statements provided in response to Request 1.a above, we have included 2013 and 2014 K-1s from 12 investment partnerships in folder 1.b.i in the accompanying electronic media.

The RJM Plan's investment earnings in 2013 were attributable to (1) securities trading and ancillary activities and (2) distributions from partnerships that engaged in similar securities trading and ancillary activities. The securities trading and related activity involved (a) the purchase (prior to the dividend record date) and sale (after the dividend record date) of stock of large-cap, high dividend paying, publicly listed European companies; (b) the hedging of the investment in these securities; (c) the financing of the securities investments via stock lending arrangements; and (d) the receipt of refunds of non-U.S. dividend withholding taxes claimed by the RJM Plan pursuant to the applicable double taxation treaty with the United States.

Income from the securities trading activities described above, net of trading and other third-party costs, including the receipt of refunds of non-U.S. dividend withholding taxes, generated the bulk of earnings in the RJM Plan in 2013 and 2014, whether made to the RJM Plan directly or through partnership distributions. Certain deposits into the RJM Plan's bank account reflect the proceeds received from various third-party service providers used by the RJM Plan in connection with the securities trading activity to the RJM Plan in 2013 and 2014. For example, deposits shown in the May, 2013 First Republic Bank statement for the RJM Plan from "Goal Taxback Limited" represent direct payment of proceeds of withholding tax refund claims to the RJM Plan by an agent that was responsible for requesting and receiving the claim. Deposits, such as the 1/15/14 deposit shown in the January, 2014 First Republic Bank statement for the RJM Plan, from "Solo Capital Partners LLP" represent payment from a custodian that received amounts on behalf of the RJM Plan or an investment partnership. Deposits shown under other names or other bank account numbers (such as the 6/10/14 and 6/19/14 deposits shown on the June, 2014 First Republic Bank statement for the RJM Plan) generally reflect distributions from the various investment partnerships. In some cases (including the 6/19/14 deposits cited in the preceding sentence), those distributions were, as more fully described in response to Request 1.b.ii and Request 2.c.i below, paid to the RJM Plan by another partner in the investment partnership that acted on behalf of the partnership in receiving investment proceeds and paying out partnership distributions in accordance with the applicable partnership agreement.

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- ii. *Submit evidence of all sources of 2012, 2013 and 2014 plan income. Submit bank and broker statements for the source of each deposit in 2012 and 2013. If amounts were transferred from other retirement plans, submit evidence to show that these plans were qualified under IRC section 401(a). Evidence should include, but is not limited to, Form 5500-series returns for 2012 and subsequent years, determination letters, plan documents and amendments.*

**RESPONSE:** Please see responses to Requests 1.a. and 1.b.i with respect to plan income generally. No amounts were transferred from plans of Mr. or Mrs. Markowitz to the RJM Plan. However, in certain instances, payments of partnership distributions were made to the RJM Plan by other plans (not plans of Mr. or Mrs. Markowitz) that were also partners in an investment partnership; these payments were attributable to partnership investment proceeds and were distributed to the RJM Plan in accordance with the applicable partnership agreement and reported as partnership distributions on Form K-1. These payments were not plan contributions, plan-to-plan transfers, or rollovers, but rather were investment proceeds. See also the response to Request 2.c.i below.

- c) *On the Markowitz 2015 Form 1040, Line 16a indicates a Gross Pension/Annuity Amount of \$3,837,258.*

- i. *Documents that you have previously submitted show a \$1,912,258 rollover in 2015 from the Calypso Plan. Please submit bank or broker statement (this should clearly show the plan or retirement account name and bank name or brokerage firm) that indicates the 2015 \$1,912,258 deposit, and*

**RESPONSE:** Please see the Jocelyn P. Herman Roth IRA RBC account statement in folder 1.c.i indicating the deposit.

- ii. *Documents that you have previously submitted show another rollover in 2015 of \$1,925,000. Please submit the bank or broker statement (this should clearly show the plan or retirement account name and bank name or brokerage firm) that indicates the 2015 \$1,925,000 withdrawal, and the bank or broker statement (this should clearly show the plan or retirement account name and bank name or brokerage firm) that indicates the 2015 \$1,925,000 deposit.*

**RESPONSE:** Please see the documents in folder 1.c.ii indicating the withdrawal from the RJM Plan (the JP Morgan account statement from the RJM Plan) and the corresponding deposit in the RJM Roth IRA (the RBC account statement).

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**2. ROUTT CAPITAL TRUST (the "Routt Plan")**

**a) Routt Capital Trust - from your pdf doc "Routt - Annual Plan Values 2014-2016 Including Sources and Uses"**

- i. *There is no 12/31/2013 asset balance, but investment earnings of \$810,251 in 2014. Submit all monthly 2014 bank and broker statements that show the source(s) that comprise the \$810,251 investment earnings in 2014 and provide a detailed explanation of each source.*

**RESPONSE:** Please see the Routt Plan bank and custodian account statements provided in folder 2.a.i. In early 2014, the Routt Plan engaged in securities trading activity similar to that described with respect to the RJM Plan in the response to Request 1.b.i above through an account at Indigo Securities Limited (also an FCA-registered firm in the U.K.). Net earnings from the trading activity in that account (which were paid through foreign currency exchanges Indigo FX Ltd. and The Currency Cloud) are the source of the \$699,980 deposit shown on the Routt Plan's initial bank statement for July, 2014 and the \$110,245.97 of deposits in September, 2014.

- ii. *The 12/31/2014 asset balance was \$584,427, and the investment earnings on this amount in 2015 was \$10,126,260. Submit all monthly 2015 bank and broker statements that show the sources of the \$10,126,260 in 2015 and provide a detailed explanation of each source.*

**RESPONSE:** Please see the response to Request 2.a.i above. In 2015, the Routt Plan's earnings were also attributable to distributions from partnerships that engaged in securities trading activity similar to that described in the response to Request 1.b.i above. The Routt Plan's 2015 bank statements and 2015 K-1s received are included in folder 2.a.ii.

**b) Routt Capital Trust - from your word doc "01 2014 Year End Account Balances"**

- i. *The Routt Capital LLC Form 5500-EZ indicates an effective date of 2/12/2014. The following investments are stated on your document "01 2014 Year End Account Balances" and do not appear to be from qualified retirement plans. If these investments were 2014 contributions, certain pension limits may have been exceeded. Please submit evidence and detailed explanations to show that 2014 and 2015 contributions did not exceed IRC sections 404 and 415.*

ROUTT CAPITAL TRUST - STATEMENT 12/31/14

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\$97,946 Bareroot Capital investments General Partnership  
\$21,079 Cedar Hill Capital Investments General Partnership  
\$21,124 Eclouge Industry General Partnership  
\$46,885 First Ascent Worldwide General Partnership  
\$129,586 First Republic Bank  
\$47,536 Green Scale Management General Partnership  
\$57,725 Hedged European Trading Strategy  
\$21,111 Keystone Technologies General Partnership  
\$48,922 Loggerhead Services General Partnership  
\$21,171 PAB Facilities Global General Partnership  
\$21,175 Roadcraft Technologies General Partnership  
\$50,167 Trailing Edge Productions General Partnership  
\$584,427

**RESPONSE:** The items listed above are investments of the Routt Plan as of 12/31/14. The amounts are not contributions from retirement plans, but rather represent the value of the Routt Plan's interest in various investment partnerships, except that (i) the First Republic Bank entry represents the Routt Plan's bank account balance and (ii) the Hedged European Trading Strategy entry represents the Routt Plan's brokerage account balance.

c) Routt Capital Trust - from your pdf doc "06 Bank Statement Year End 2015"

- i. December 2015 bank statement indicates the deposits as pasted below. Each of these deposits must be explained in detail. Are these plans that Richard or Jocelyn Markowitz participated in? These plans were not mentioned in your prior correspondence. If amounts were deemed rollovers, submit evidence to show that these plans were qualified under IRC section 401(a). Evidence should include, but is not limited to, Form 5500-series returns for 2014 and subsequent years, determination letters, plan documents and amendments.

Date	Description	Amount
12/14	DEPOSIT-WIRED FUNDS ROADCRAFT TECHNOLOGIES LLC ROTH 401	167,050.00
12/17	DEPOSIT-WIRED FUNDS BAREROOT CAPITAL LLC ROTH 401k PLAN	63,700.00
12/21	DEPOSIT-WIRED FUNDS KEYSTONE TECHNOLOGIES LLC ROTH 401k	186,650.00
12/21	DEPOSIT-WIRED FUNDS GREEN SCALE MANAGEMENT LLC ROTH	179,650.00
12/31	CREDIT - INTEREST	13.88
	TOTAL ITEMS 5	\$597,063.88

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**RESPONSE:** These deposits are partnership distributions from the Routt Plan's investment in the general partnerships listed in the response to Request 3.b.i above, and are not plan contributions or plan-to-plan transfers or rollover amounts. The Routt Plan and each of the plans listed immediately above were general partners in separate investment partnerships (included in the list in Request 3.b.i above). The payments listed immediately above were paid to the Routt Plan by these listed plans on behalf of the associated general partnerships, and were owed to the Routt Plan pursuant to the terms of the applicable general partnership agreement. These partnership distribution amounts (plus other distributions received during 2015) are reflected in the K-1 statements received by the Routt Plan for 2015. None of the above plans was a plan of Mr. or Mrs. Markowitz or any of their family members.

d) Routt Capital Trust – from your pdf doc “2 First Republic Bank Checking Statement – 2016-02 – Routt Capital 401K Plan”

i. The 12/31/2015 ending asset balance was \$1,154,766 per your pdf doc “Routt - Annual Plan Values 2014-2016 Including Sources and Uses”. The 2/1/2016 beginning balance was \$1,698,772.44. Submit evidence to show the income sources during the month of January 2016.

**RESPONSE:** Please see the bank statement for the Routt Plan for January, 2016 in folder 2.d.i showing deposit activity, all of which was attributable to partnership distributions during the month of January, 2016. 2016 K-1s received by the Routt Plan reflecting the January, 2016 distributions are also included in folder 2.d.i. Payments were paid to the Routt Plan on behalf of the associated general partnerships, and were owed to the Routt Plan pursuant to the terms of the applicable general partnership agreement.

3.

a)

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**RESPONSE:**

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**Redacted - Relevance**

- b) *Submit all bank and broker statements that show all sources of all deposits made during 2015 and 2016. If the statements submitted do not clearly indicate the source entity, please provide this additional information.*

**RESPONSE:**

**Redacted - Relevance**

**4. CALYPSO INVESTMENT PENSION PLAN (the "Calypso Plan")**

- a) *Show sources of the deposits made during 2014 that comprise the following two amounts indicated in documents you previously submitted:*

\$2,039,654 FRB Bank Account 12/31/14  
\$ 21,525 Hedged European Trading Strategy

**RESPONSE:** Please see the documents provided in folder 4.a. In 2014, the Calypso Plan engaged in securities trading activity similar to that described with respect to the RJM Plan in the response to Request 1.b.i. The bank statements show deposits of trading proceeds paid to the Calypso Plan. The balance denominated Hedged European Trading Strategy is the Calypso Plan's balance at the U.K. broker/custodian.

- b) *Submit all bank and broker statements that show all sources of all deposits made during 2015 and 2016. If the statements submitted do not clearly indicate the source entity, please provide this additional information.*

**RESPONSE:** Please see the documents in folder 4.b. Although the Calypso Plan did not engage in securities trading activity in 2015, in certain instances the refunds of



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withholding taxes claimed on dividends paid in 2014 were received by the Calypso Plan in 2015. The only other source of income in 2015 and 2016 is interest income.

## 5. ADDITIONAL PLANS

- a) *For the following retirement plans, submit all bank and broker statements that show all sources of all deposits made during 2014, 2015 and 2016. If the statements submitted do not clearly indicate the source entity, please provide this additional information.*

PLAN	DATE PLAN ORIGINALLY EFFECTIVE
AVANIX MANAGEMENT LLC ROTH 401(K) PLAN	7/16/2014
BATAVIA CAPITAL PENSION PLAN	6/11/2014
CAVUS SYSTEMS LLC ROTH 401(K) PLAN	7/16/2014
HADRON INDUSTRIES LLC ROTH 401(K) PLAN	7/16/2014

**RESPONSE:** Please see the documents provided in folder 5.a. and our response to Request 5 submitted 10/4/18. Each of the above plans engaged in securities trading activity similar to that described with respect to the RJM Plan in the response to Request 1.b.i above.

- b) *For the following Individual Retirement Plans, submit all bank and broker statements that show all sources of all deposits made during 2014, 2015, 2016 and 2017. If the statements submitted do not clearly indicate the source entity and/or the name of the retirement account, please provide this additional information.*

<u>Account</u>	<u>Payer Entity:</u>	<u>IRA-per Forms 5498 filed</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>
<u>Number:</u>							

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**RESPONSE:** Please see the documents provided in folder 5.b.

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Redacted - Relevance

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## Redacted - Relevance

c) Please provide details regarding the plans listed below \*.

*\*BATTU HOLDINGS LLC ROTH 40100 PLAN,  
CRUCIBLE VENTURES LLC ROTH 401 (k) PLAN,  
TRUE WIND INVESTMENTS LLC ROTH 401 (k) PLAN,  
LIMELIGHT GLOBAL PRODUCTIONS LLC ROTH 401(k) PLAN-  
MONOMER INDUSTRIES LLC ROTH 401(k) PLAN.  
PLUMROSE INDUSTRIES LLC ROTH 401 (k) PLAN*

i. *What is the relationship of each plan to Mr. and Mrs. Markowitz and all entities to which they are associated?*

**RESPONSE:** Mr. Markowitz was the designated Manager of and, through LLCs that were disregarded entities, provided administrative services to, investment partnerships in which the above plans were partners. Monomer Industries LLC is 100% owned by Mr. Markowitz's sister. Except as noted above, neither Mr. nor Mrs. Markowitz has an ownership or familial relationship to any of the above-listed plans or their plan sponsors.

ii. *If these are plans maintained by entities in which Mr. or Mrs. Markowitz have any ownership interest, submit a copy of Form 5500-series return for the 2014, 2015, 2016 & 2017 plan years.*

**RESPONSE:** N/A.

iii. *If these are plans maintained by entities in which Mr. or Mrs. Markowitz have any ownership interest, please provide all monthly bank and broker statements for each plan for each plan year from the plan's initial effective date through December 31, 2017.*

**RESPONSE:** N/A.

### 6. JOCELYN P HERMAN (MARKOWITZ)

*For 2014, 2015, 2016 and 2017, list all retirement plans and Individual Retirement Accounts that the taxpayer participated in. For each of these plan years, state her contributions, rollovers (into and out of accounts), transfers (into and out of accounts), distributions and the fair market*

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*value of each plan and IRA at the beginning and end of each year. For each of these contributions, rollovers, transfers and distributions, submit all bank and broker statements of accounts from which the transaction commenced and the accounts to which the transaction ended. If the statements submitted do not clearly indicate the source entity and/or the name of the retirement account, please provide this additional information.*

RESPONSE:

Redacted - Relevance

**Redacted - Relevance**

Mrs. Markowitz also participated in the Calypso Plan, the Routt Plan

Redacted - Relevance

Information concerning these plans has been provided in the responses above.

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Once you have had an opportunity to review our responses, I would appreciate setting up a call to discuss the progress you have made on the audit and understand the anticipated timing for resolution.

Kindly acknowledge receipt of this response by date stamping the enclosed copy of this letter and returning it to me in the envelope provided.

Very truly yours,



Amy A. Null

Enclosure

cc: Richard J. Markowitz

INTERNAL REVENUE SERVICE



FAX TRANSMISSION  
Cover Sheet

Date: February 04, 2019

To: AMY NULL

Address/Organization: \_\_\_\_\_

Fax Number: (617) 526-5000 Office Number: \_\_\_\_\_

From: Petshaft Sharon L

Address/Organization: \_\_\_\_\_

Fax Number: (855) 256-3264 Office Number: \_\_\_\_\_

Number of pages:  Including cover page

Subject: REQUEST FOR ADDITIONAL INFORMATION

Attached please find a request for additional information. The letter attached has a total of six pages. Please contact me if you have any questions or did not receive a total of seven pages which includes this cover.

Thank you for your continued cooperation in this matter.

Sharon Petshaft  
Employee Plans Specialist  
(203) 492-8622  
Sharon.L.Petshaft@irs.gov

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TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

INTERNAL REVENUE SERVICE  
TE/GE EMPLOYEE PLANS  
150 Court Street, 5<sup>th</sup> Floor  
New Haven, CT 06510

DEPARTMENT OF THE TREASURY

Date: February 4, 2019

Amy A. Null, Esq.  
Wilmer Hale  
60 State Street  
Boston, MA 02109

Plan Name:	RJM Capital Pension Plan Plan 001
Plan Year Ending:	December 31, 2016
Form:	5500-EZ
Person to Contact / ID Number:	Sharon Petshaft / 06-03467
Contact Telephone / Fax Number:	203.492-8622 / 855.256-3264
E-mail:	Sharon.L.Petshaft @irs.gov

Dear Ms. Null,

Pursuant to our examination of the retirement plan for the above year, we find we need additional information. The information needed is shown on the enclosed form. You may also furnish any other documents or explanatory material that you believe will be helpful for our review.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter. When you send any requested information or write to us with questions about this letter, please provide your telephone number and the most convenient time for us to call if we need more information. Thank you for your cooperation.

Please send this information within 21 days from the date of this letter.

Sincerely yours,

*Sharon Petshaft*

Sharon Petshaft  
Employee Plans Specialist

Enclosure

REQUEST FOR ADDITIONAL INFORMATION

Please submit the following information by February 25, 2019 to:

Sharon Petshaft

Tel 203-492-8622

Internal Revenue Service

Fax 203-492-8649

150 Court Street; 5<sup>th</sup> Floor

New Haven, CT 06510

E-mail: Sharon.L.Petshaft@irs.gov

**1. RJM Capital LLC Pension Plan**

- a) Please submit all monthly bank and broker statements for 2012, 2013, 2014, 2015 and 2016.
- b) RJM Capital– from your pdf doc “RJM Capital Annual Plan Values 2013 – 2016”
- i. The 12/31/2012 asset balance \$0, but investment earnings were \$6,806,136 in 2013. Submit all monthly 2013 bank and broker statements that show the source(s) that comprise the \$6,806,136 investment earnings in 2013 and provide a detailed explanation of each source.
  - ii. Submit evidence of all sources of 2012, 2013 and 2014 plan income. Submit bank and broker statements for the source of each deposit in 2012 and 2013. If amounts were transferred from other retirement plans, submit evidence to show that these plans were qualified under IRC section 401(a). Evidence should include, but is not limited to, Form 5500-series returns for 2012 and subsequent years, determination letters, plan documents and amendments.
- c) On the Markowitz 2015 Form 1040, Line 16a indicates a Gross Pension/Annuity Amount of \$3,837,258.
- i. Documents that you have previously submitted show a \$1,912,258 rollover in 2015 from the Calypso Plan. Please submit bank or broker statement (this should clearly show the plan or retirement account name and bank name or brokerage firm) that indicates the 2015 \$1,912,258 deposit, and
  - ii. Documents that you have previously submitted show another rollover in 2015 of \$1,925,000. Please submit the bank or broker statement (this should clearly show the plan or retirement account name and bank name or brokerage firm) that indicates the 2015 \$1,925,000 withdrawal, and the bank or broker statement (this should clearly show the plan or retirement account name and bank name or brokerage firm) that indicates the 2015 \$1,925,000 deposit.

## 2. ROUTT CAPITAL TRUST

- a) Routt Capital Trust – from your pdf doc “Routt - Annual Plan Values 2014 – 2016 Including Sources and Uses”
- i. There is no 12/31/2013 asset balance, but investment earnings of \$810,251 in 2014. Submit all monthly 2014 bank and broker statements that show the source(s) that comprise the \$810,251 investment earnings in 2014 and provide a detailed explanation of each source.
  - ii. The 12/31/2014 asset balance was \$584,427, and the investment earnings on this amount in 2015 was \$10,126,260. Submit all monthly 2015 bank and broker statements that show the sources of the \$10,126,260 in 2015 and provide a detailed explanation of each source.
- b) Routt Capital Trust – from your word doc “01 2014 Year End Account Balances”
- i. The Routt Capital LLC Form 5500-EZ indicates an effective date of 2/12/2014. The following investments are stated on your document “01 2014 Year End Account Balances” and do not appear to be from qualified retirement plans. If these investments were 2014 contributions, certain pension limits may have been exceeded. Please submit evidence and detailed explanations to show that 2014 and 2015 contributions did not exceed IRC sections 404 and 415.

### ROUTT CAPITAL TRUST - STATEMENT 12/31/14

\$97,946	Bareroot Capital Investments General Partnership
\$21,079	Cedar Hill Capital Investments General Partnership
\$21,124	Eclouge Industry General Partnership
\$46,885	First Ascent Worldwide General Partnership
\$129,586	First Republic Bank
\$47,536	Green Scale Management General Partnership
\$57,725	Hedged European Trading Strategy
\$21,111	Keystone Technologies General Partnership
\$48,922	Loggerhead Services General Partnership
\$21,171	PAB Facilities Global General Partnership
\$21,175	Roadcraft Technologies General Partnership
<u>\$50,167</u>	Trailing Edge Productions General Partnership
<u>\$584,427</u>	



c) Routt Capital Trust – from your pdf doc “06 Bank Statement Year End 2015”

- i. December 2015 bank statement indicates the deposits as pasted below. Each of these deposits must be explained in detail. Are these plans that Richard or Jocelyn Markowitz participated in? These plans were not mentioned in your prior correspondence. If amounts were deemed rollovers, submit evidence to show that these plans were qualified under IRC section 401(a). Evidence should include, but is not limited to, Form 5500-series returns for 2014 and subsequent years, determination letters, plan documents and amendments.

DATE	DESCRIPTION	AMOUNT
12/14	DEPOSIT-WIRED FUNDS ROADCRAFT TECHNOLOGIES LLC ROTH 401	167,050.00
12/17	DEPOSIT-WIRED FUNDS BAREROOT CAPITAL LLC ROTH 401K PLAN	63,700.00
12/21	DEPOSIT-WIRED FUNDS KEYSTONE TECHNOLOGIES LLC ROTH 401K	186,650.00
12/21	DEPOSIT-WIRED FUNDS GREEN SCALE MANAGEMENT LLC ROTH	179,650.00
12/31	CREDIT – INTEREST	13.88
TOTAL	ITEMS 5	\$597,063.88

d) Routt Capital Trust – from your pdf doc “2 First Republic Bank Checking Statement – 2016-02 – Routt Capital 401K Plan”

- i. The 12/31/2015 ending asset balance was \$1,154,766 per your pdf doc “Routt - Annual Plan Values 2014 – 2016 Including Sources and Uses”. The 2/1/2016 beginning balance was \$1,698,772.44. Submit evidence to show the income sources during the month of January 2016.

# Redacted - Relevance

**4. CALYPSO INVESTMENT PENSION PLAN**

- a) Show sources of the deposits made during 2014 that comprise the following two amounts indicated in documents you previously submitted:  
 \$2,039,654 FRB Bank Account 12/31/14  
 \$ 21,525 Hedged European Trading Strategy
- b) Submit all bank and broker statements that show all sources of all deposits made during 2015 and 2016. If the statements submitted do not clearly indicate the source entity, please provide this additional information.

**5. ADDITIONAL PLANS**

- a) For the following retirement plans, submit all bank and broker statements that show all sources of all deposits made during 2014, 2015 and 2016. If the statements submitted do not clearly indicate the source entity, please provide this additional information.

PLAN	DATE PLAN ORIGINALLY EFFECTIVE
AVANIX MANAGEMENT LLC ROTH 401(K) PLAN	7/16/2014
BATAVIA CAPITAL PENSION PLAN	6/11/2014
CAVUS SYSTEMS LLC ROTH 401(K) PLAN	7/16/2014
HADRON INDUSTRIES LLC ROTH 401(K) PLAN	7/16/2014

- b) For the following Individual Retirement Plans, submit all bank and broker statements that show all sources of all deposits made during 2014, 2015, 2016 and 2017. If the statements submitted do not clearly indicate the source entity and/or the name of the retirement account, please provide this additional information.

ACCOUNT NUMBER:	PAYER ENTITY:	IRA - per Forms 5498 filed	2013	2014	2015	2016	2017
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# Redacted - Relevance

c) Please provide details regarding the plans listed below \*.

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BATTU HOLDINGS LLC ROTH 401(k) PLAN.

CRUCIBLE VENTURES LLC ROTH 401(k) PLAN.

TRUE WIND INVESTMENTS LLC ROTH 401(k) PLAN.

LIMELIGHT GLOBAL PRODUCTIONS LLC ROTH 401(k) PLAN.

MONOMER INDUSTRIES LLC ROTH 401(k) PLAN.

PLUMROSE INDUSTRIES LLC ROTH 401(k) PLAN

- i. What is the relationship of each plan to Mr. and Mrs. Markowitz and all entities to which they are associated?
- ii. If these are plans maintained by entities in which Mr. or Mrs. Markowitz have any ownership interest, submit a copy of Form 5500-series return for the 2014, 2015, 2016 & 2017 plan years.
- iii. If these are plans maintained by entities in which Mr. or Mrs. Markowitz have any ownership interest, please provide all monthly bank and broker statements for each plan for each plan year from the plan's initial effective date through December 31, 2017.

#### **6. JOCELYN P HERMAN (MARKOWITZ)**

For 2014, 2015, 2016 and 2017, list all retirement plans and Individual Retirement Accounts that the taxpayer participated in. For each of these plan years, state her contributions, rollovers (into and out of accounts), transfers (into and out of accounts), distributions and the fair market value of each plan and IRA at the beginning and end of each year. For each of these contributions, rollovers, transfers and distributions, submit all bank and broker statements of accounts from which the transaction commenced and the accounts to which the transaction ended. If the statements submitted do not clearly indicate the source entity and/or the name of the retirement account, please provide this additional information.

END